

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION
CIVIL ACTION NO.: 1:21-CV-00059

Rachel Howald,

Plaintiff,

vs.

Ben Lippen School, an assumed business name for Columbia International University (formerly known as Columbia Bible College), and Pamela Kaye Herrington,

Defendants.

DEFENDANT BEN LIPPEN SCHOOL'S
MOTION TO TRANSFER VENUE

Defendant Ben Lippen School, which operates as a ministry and institution of Columbia International University (“CIU”) (collectively “Defendant BLS”), by and through its undersigned counsel, hereby moves this Honorable Court to transfer venue of this action to the United States District Court for the District of South Carolina, Columbia Division pursuant to 28 U.S.C. § 1404(a), as the convenience of the parties and witnesses and the interest of justice support a transfer of this matter to the United States District Court for the District of South Carolina, Columbia Division. For these reasons and those fully outlined in the contemporaneously filed Memorandum in Support of Defendant BLS’ Motion to Transfer and attached Affidavit, Defendant BLS respectfully requests that the Court transfer venue of this action to the United States District Court for the District of South Carolina, Columbia Division.

To the extent the Court determines this is a non-dispositive motion, Defendant BLS conferred with Plaintiff, pursuant to Local Civil Rule 7.1(b), and Plaintiff does not consent to Defendant BLS’ Motion to Transfer.

TURNER PADGET GRAHAM & LANEY, PA

s/Hannah D. Stetson

Hannah D. Stetson (N.C. Bar # 44826)

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March 31, 2021

ATTORNEYS FOR DEFENDANT BLS

CERTIFICATE OF SERVICE

THE UNDERSIGNED HEREBY CERTIFIES that, on March 31, 2021, the undersigned filed the foregoing **MOTION TO TRANSFER VENUE** in the above-referenced matter and it was filed electronically with the clerk of court using the CM/ECF system with notice of case activity to be generated and sent electronically by the clerk of court to the following parties registered to receive such service:

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Appearing Pro Hac Vice

and served the same to the Defendant Pamela Kaye Herrington, by placing a copy in the United States Mail, with due and proper postage affixed thereto as addressed below:

Pamela Kaye Herrington
c/o Bill Trosch, Esquire
Michael S. Todd, Esquire
Conrad Trosch & Kemmy, PA
301 S. McDowell Street, Suite 1001
Charlotte, NC 28204

s/Hannah D. Stetson

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